

**IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

IN RE:

CASE NO.: **6:17-bk-03989-CCJ**

BERNICE VERNON ADAM JONES-WRIGHT,

Debtor(s).

**OBJECTION TO CLAIM NUMBER 4-1 OF HABITAT FOR HUMANITY OF
GREATER ORLANDO AREA, INC.**

**NOTICE OF OPPORTUNITY TO
OBJECT AND REQUEST FOR HEARING**

Pursuant to Local Rule 2002-4, the Court will consider the relief requested in this paper without further notice or hearing unless a party in interest files a response within 30 days from the date set forth on the attached proof of service, plus an additional three days for service if any party was served by U.S. Mail.

If you object to the relief requested in this paper, you must file a response with the Clerk of the Court at 400 W. Washington Street, Suite 5100, Orlando, FL 32801 and serve a copy on the movant's attorney, Keith D. Collier, 2350 Park Street, Jacksonville, Florida 32204, and any other appropriate persons within the time allowed. If you file and serve a response within the time permitted, the Court will either schedule and notify you of a hearing or consider the response and grant or deny the relief requested without a hearing.

If you do not file a response within the time permitted, the Court will consider that you do not oppose the relief requested in the paper, will proceed to consider the paper without further notice or hearing, and may grant the relief requested.

COMES NOW the above-named debtor, by and through her attorney of record, Keith D. Collier, pursuant to Rule 3007 of the Rules of Bankruptcy Procedure and objects to the Proof of Claim filed in this case by Habitat for Humanity of Greater Orlando Area, Inc., and states:

1. This case was commenced by the filing of a petition with the Clerk of this court on June 16, 2017.
2. Habitat for Humanity of Greater Orlando Area, Inc., Inc. filed a purported proof of claim in the amount of \$25,162.34 for "Money Loaned-Fourth Mortgage" (designated as secured). Specifically, the claim states that this amount is secured by "2464 Pillar Coral Drive, Villa 100, Orlando FL 32808".

3. The Debtor objects to the filing of the said Proof of Claim on the basis that the underlying debt does not require payments nor does the principle balance become due during the terms of the pending bankruptcy per the note and mortgage documents unless the property is sold, transferred or there is a default on the first mortgage.

4. The first mortgage shall be paid and all arrearages cured in the pending chapter 13 curing the default and therefore taking this mortgage and claim out of default.

WHEREFORE, the Debtor respectfully requests this Court allow the claim to stand and the Creditor to retain its lien but Order that the claim shall receive no distribution under the plan, and for any further relief as the Court may deem just and proper.

DATED: December 12, 2017

The Law Offices of Keith D. Collier, PLLC

/s/ Keith D. Collier, Esquire

KEITH D. COLLIER

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Attorney for Debtor(s)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Notice of Filing Objection to Claim Number 4-1 has been furnished to the following interested parties by Electronic Mail, Laurie K. Weatherford, and following interested parties by U.S. Mail this December 12, 2017.

Andrew Houchins
PO Box 3146
Orlando FL 32802

/s/ Keith D. Collier, Esquire
Attorney for Debtor